

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

JOHN NOAKES,

Plaintiff,

v.

CASE WESTERN RESERVE
UNIVERSITY,

Defendant.

Case No. 1:21-cv-1776-PAB

Judge: BARKER

JOINT MOTION TO RESET CASE
SCHEDULE

Pursuant to this Court's September 6, 2022 entry, Plaintiff John Noakes and Defendant Case Western Reserve University respectfully submit this Joint Motion to Reset the Case Schedule.

As grounds for this Motion, the Parties state:

The Parties agreed to stay litigation and discovery in order to allow for resolution of pending disciplinary matters against Plaintiff and then to discuss potential settlement of this case. To date, the Parties have been unable to reach a settlement of this matter following the resolution of all outstanding disciplinary matters against Plaintiff. The Parties, therefore, having conferred, request that the Court set the following schedule for the resolution of this litigation:

- Recommended deadline to file Amended Complaint: October 7, 2022
- Recommended fact discovery cut-off date: January 31, 2023
- Recommended dispositive motion date: May 31, 2023
- Recommended expert discovery date: April 30, 2023
- Expert report(s) by party initially seeking to introduce expert testimony recommended due date: February 28, 2023; Responsive expert report(s) due date: March 31, 2023
- Recommended date for Status Hearing: December 2022

FOR PLAINTIFF:

/s/ Joshua Engel
Joshua Adam Engel (0075769)
Anne Tamashasky (0064393)
ENGEL AND MARTIN, LLC
4660 Duke Drive, Ste. 101
Mason, OH 45040
(513) 445-9600
(513) 492-8989 (Fax)
engel@engelandmartin.com

FOR DEFENDANT:

/s/ Amanda Quan
John Gerak (#0075431)
Amanda T. Quan (#0086623)
OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.
127 Public Square
4100 Key Tower
Cleveland, OH 44114
216.241.6100
216.357.4733 (FAX)
john.gerak@ogletree.com
amanda.quan@ogletree.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served via the Courts ECF system this September 20, 2022 upon all counsel of record.

/s/ Joshua Engel
Joshua Engel